

WNEB



Tom Fink,  
Mayor

## ANCHORAGE WATER & WASTEWATER UTILITY

Operations Division  
325 East 94th Court  
Anchorage, Alaska 99515-2111  
Telephone: (907) 267-4505

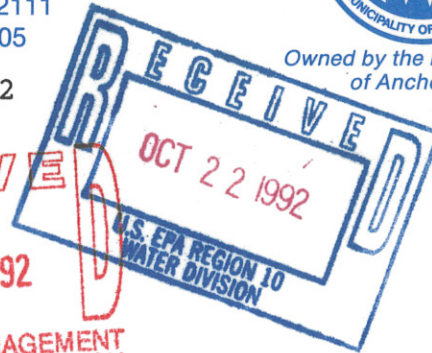


Owned by the Municipality  
of Anchorage

October 15, 1992

Mr. Robert S. Burd, Director  
Water Division (WD-131)  
EPA, Region X  
1200 Sixth Avenue  
Seattle, Washington 98101

RECEIVED  
OCT 22 1992  
WASTE WATER MANAGEMENT  
AND ENFORCEMENT BRANCH  
EPA - REGION 10



RE: ANCHORAGE NON-INDUSTRIAL SOURCE CONTROL PROGRAM ANNUAL REPORT  
POINT WORONZOF NPDES PERMIT NO. AK-002255-1

As required by Section I.C.2.c of our permit (pp. 28 and 29 of 41) for the John M. Asplund Wastewater Treatment Facility at Point Woronzof, we are transmitting an updated report on the implementation status of Anchorage's non-industrial source control program. The report covers activities in the 12 month period ending August 31, 1992 as well as planned activities for the next year.

It may be noted that some items discussed in this report have a larger focus than simply controlling the discharge of toxic pollutants to the wastewater collection system and may in part be targeted to small businesses (i.e. "industrial" sources of toxics). They have been included because they in some way helped to educate the public in proper disposal of toxics, and thus indirectly helped reduce improper disposal to the wastewater collection system.

Updated responses to the five listed permit conditions are summarized as follows:

- 1) "DEVELOP AND ADOPT AS NECESSARY, ORDINANCES TO CONTROL THE INTRODUCTION OF TOXIC POLLUTANTS FROM NON-INDUSTRIAL SOURCES TO THE WASTEWATER COLLECTION SYSTEM. AS PART OF THIS ACTIVITY, ORDINANCES TO REVISE BUILDING CODES AND CONTROL THE SALE OF TOXIC POLLUTANTS SHALL BE CONSIDERED:"
  - a) The Anchorage Municipal Code (AMC 26.50) sewer use ordinance regulates the discharge of pollutants from all sources to the wastewater collection system. Recalculated technically based local limits on toxic pollutants were submitted to the EPA Pretreatment Coordinator in October 1989. A draft revised ordinance was submitted April 30, 1992 incorporating suggestions from the Pretreatment Coordinator and the requirements of the 1990 changes to the General Pretreatment Regulations. Upon approval by EPA, the ordinance containing the revised local limits will be introduced to the Anchorage Assembly for adoption.
  - b) The Community Right-To-Know Ordinance, AMC 16.110, "Storage of Hazardous Materials and Hazardous Waste" was adopted by the Assembly on December 8, 1987. It is being implemented by the Anchorage Fire Department. The ordinance is consistent with State of Alaska Right-To-Know regulations adopted in 1987 and with the SARA Title III Emergency Planning and Community Right-To-Know Act. The language of the ordinance is also consistent with the Anchorage Water and Wastewater Utility's (AWWU) information requirements for the Accidental Spill Prevention Plan (ASPP).



The Community Right-To-Know (CRTK) ordinance authorizes the Anchorage Fire Department to obtain information on hazardous and toxic materials stored in buildings within the Municipality of Anchorage, including information needed to fulfill the tasks described in the ASPP. The input of CRTK information from Anchorage businesses to the Cameo computer program was finished last year.

- c) An ordinance concerning Hazardous Materials Transportation has been drafted. The ordinance incorporates Title 49 by reference and covers placarding, truck routes through the city, penalties, etc. It is uncertain at this time when and if it will be adopted.
- 2) **"DISPOSAL GUIDELINES SPECIFYING WHAT TOXIC POLLUTANTS CAN AND CANNOT BE DISCHARGED TO THE SEWER SYSTEM AND IDENTIFYING ALTERNATIVE DISPOSAL METHODS FOR PROHIBITED POLLUTANTS SHALL BE DEVELOPED:"**
  - a) Hazardous waste disposal guidelines that have been developed, published, and distributed prior to this last year were previously sent to you. See Appendix A in the Hazardous Waste Management Plan Summary Report for a summary of these materials. The Disposal Directory for Small Quantities of Hazardous Waste was revised and reprinted in January 1989 and is given out to the public on a regular, frequent basis. This document was prepared with the advice and guidance of many Municipal, State, and Federal agencies and public and private organizations including AWWU. AWWU is also listed as one of the agencies that give ongoing disposal guidance over the telephone. The directory will likely be revised in the coming year. The Sewer Use Ordinance also contains discharge limitations that apply to non-industrial as well as industrial discharges.
  - b) The Municipality's Department of Health and Human Services (DHHS) and Solid Waste Services (SWS) have programs designed in part to provide proper disposal guidelines for toxic pollutants. DHHS has given a number of school and community presentations on preserving water quality over the last year. SWS gave a dozen or so talks to schools concerning proper handling of household hazardous wastes. SWS developed a unit to be incorporated into the elementary school curriculum on proper disposal of toxic pollutants. Teachers use the material to provide a four, six, or eight week course of study.
  - c) SWS sent a mailing to 100,000 households in Anchorage outlining proper disposal of hazardous waste during the last reporting year. It stated specifically that a number of products such as paints, solvents, pesticides, resins and adhesives should not be disposed of to the sewer. The mass mailing was not repeated this year but the flyer is given out to the public on a regular, frequent basis.
  - d) DHHS has implemented two projects designed to increase public awareness that toxics should not be discharged to storm sewers. The first is a display designed to educate the public about the storm drainage system, now making the rounds in malls and government buildings. The second is the "adopt a drain" program where volunteer groups stencil the message "Dump no Waste" onto manhole lids. There are now over 500 lids with this stenciled message. The increased public awareness of proper disposal of wastes will benefit a control program for sanitary sewers also.



- e) The non-profit organization Alaska Health Project is conducting several activities in Anchorage that should result in less toxics discharged to the sewer. Their Waste Reduction Assistance Program (WRAP) provides information, technical assistance, and on-site consultation to local small businesses and the public, one focus being wastewater discharge. They published a waste reduction audit for beauty salons this year, and will publish one for general offices next year. AWWU will help disseminate this information during pretreatment inspections. They offer a telephone service to advise the public on proper disposal of hazardous materials. They have given and will continue to give presentations to community groups on proper disposal of hazardous materials. The Health Project is using a federal grant to study waste oil re-use. Public education on proper management and disposal will follow the three year study. They also received a state grant through June 30, 1992 to operate a "Pollution Prevention Hotline" and distribute a pollution prevention newsletter five times per year, with most of the 1500 mailings going to Anchorage.
- f) ADEC initiated a pollution prevention department in August 1990. The program was active last year providing assistance to municipalities and businesses with waste reduction. They funded the Pollution Prevention Hotline and bulletin mentioned above. Round table discussions between municipal managers have been organized to stimulate municipal pollution prevention activities. AWWU pretreatment personnel were able to attend a training course in waste reduction in paint operations. Grants have been made available to local government, businesses, and other groups for pollution prevention activities. AWWU will evaluate whether such a grant could be used in the non-industrial source control program.
- g) The non-profit organization Alaska Center for the Environment (ACE) conducts several activities that will help reduce toxics to the sewer. ACE offers telephone assistance to the public on management and disposal of hazardous household substances. They give talks to community groups and distribute handouts to the public on proper disposal of hazardous materials. ACE also gave presentations to the Anchorage Chamber of Commerce on environmental business tips, and published articles in the Chamber newsletter. Next year they plan to publish a follow-up to their "Guide to Greener Living in Southcentral Alaska", an 80-page booklet describing less toxic substitutes for household products and proper disposal of hazardous household substances.

In coordination with the Anchorage Chamber of Commerce and the Alaska Department of Environmental Conservation, ACE initiated the Green Star Program in 1990. Businesses in Anchorage voluntarily strive to meet an established standard incorporating waste reduction, recycling, etc. So far, 119 businesses have enrolled, with 16 of them earning the "Green Star" designation, having met the program's standards. Next year the scope will broaden to incorporate schools, churches, government agencies, etc. A second level to the program will be created this coming year with business specific standards. For example, dry cleaners will have a unique set of pollution prevention standards they will voluntarily achieve to earn the "Earth Star" designation. Participation in the program can be used in the businesses' advertisements. This April, U.S. EPA head William Reilly recognized the Green Star program with 34 other environmental programs nationwide as being one of the country's most progressive in preventing pollution.



- 3) **"IMPLEMENT THE CONTROL PROGRAM FOR NON-INDUSTRIAL SOURCES AS CONTAINED IN THE PRETREATMENT PROGRAM APPROVED BY EPA ON APRIL 9, 1982. AS PART OF THIS PROGRAM, THE FOLLOWING SHALL BE ADDRESSED: DEVELOPMENT OF CONTROL PROGRAMS FOR SPECIFIC NON-INDUSTRIAL CATEGORIES OF SOURCES, INCLUDING A PROGRAM DESCRIPTION, METHOD OF ENFORCEMENT, MONITORING PROGRAM, AND SCHEDULE FOR IMPLEMENTATION:"**
- a) The Sewer Ordinance covers both industrial and non-industrial dischargers. It contains discharge limitations that were established on a technical basis, as required by the EPA. The Hazardous Waste Management Plan provides for alternative disposal for non-industrial sources and addresses the areas listed in this permit requirement. As we did during implementation of our Industrial Pretreatment Program in 1990-91, we will continue regular monitoring of specific industrial dischargers. Any noted prohibited discharges, whether from industrial or non-industrial sources, are investigated.
- b) Leachate discharges from the Anchorage Regional Landfill and the closed Merrill Field Landfill are controlled and permitted by AWWU. The permit for the Regional Landfill required that a leachate characterization study be conducted to summarize trends in monitoring data and to project if and when pretreatment facilities should be installed to pretreat leachate prior to sewer disposal.
- c) AWWU has an ongoing program that will reduce infiltration/inflow (I/I) to the sewer system by repair and replacement construction projects. Approximately \$155,000 was spent this last year on repair. Over the coming year, we are proposing that around 2.4 million dollars will be spent on construction that will reduce I/I.
- 4) **"PROVIDE ALTERNATIVE DISPOSAL METHODS FOR NON-INDUSTRIAL TOXIC POLLUTANTS SUCH AS THE ANNUAL HAZARDOUS WASTE CLEANUP PROGRAM:"**
- a) The Eagle River Hazardous Waste Collection Facility (ERHWCF), a drop-off station in downtown Anchorage, and a pick-up service, began operation in February 1989. The usage of the facility has continued to increase this last year:

| 12 month period   | Items Processed | % Increase From Previous Year | Pounds Processed | % Increase from Previous Year |
|-------------------|-----------------|-------------------------------|------------------|-------------------------------|
| 9/1/89 to 8/31/90 | 38,695          |                               | 474,786          |                               |
| 9/1/90 to 8/31/91 | 51,900          | 34                            | 831,203          | 75                            |
| 9/1/91 to 8/31/92 | 52,083          | 0.4                           | 958,121          | 15                            |

Using calculations from the period February 1990 to February 1991, it's estimated that 85 percent of all users are households and fifteen percent are conditionally exempt industries. It is estimated that 27 percent of the total pounds of hazardous waste received comes from households, 43 percent comes from conditionally exempt industrial users, and 30 percent is made up of lead acid batteries, the majority of which comes from households.

During May, households were allowed to drop off hazardous waste at the facility free of charge. Advertisements have increased awareness of the facility. A mailing describing the facility was sent to 100,000 households in Anchorage during the previous reporting year. The increased usage has surely resulted in less non-industrial toxics being disposed of to the sewer.

- 5) **"ADOPT A HAZARDOUS WASTE MANAGEMENT PLAN FOR SMALL QUANTITY GENERATORS, INCLUDING IMPLEMENTING ORDINANCES:"**
- a) The Hazardous Waste Management Plan was adopted by the Municipal Assembly in 1986. Revisions to AMC 26.50, the Sewer Ordinance, were adopted on August 5, 1986; AMC 16.110, the Community Right-To-Know Ordinance, was adopted by the Assembly on December 8, 1987.
- b) The Hazardous Materials Commission (HMC) is made up of local government, business, and community representatives. It meets regularly in order to plan and implement a hazardous materials management plan. A Local Emergency Planning Committee (LEPC) was approved on June 19, 1991 by the State Emergency Response Commission. It is charged with preparing a response plan for hazardous material incidents. The Anchorage Water and Wastewater Utility's Pretreatment Coordinator is serving on both the HMC and LEPC and will incorporate the non-industrial source control program when appropriate in the implementation of hazardous materials management plans.

Two activities of the HMC which pertain to non-industrial source control were started this year. The HMC is designing a brochure for elementary school children on proper handling and disposal of hazardous materials which will be distributed next year. A subcommittee is researching the creation of a second waste oil collection and recycling program for Anchorage residents by local gas stations.

The comparison of sewage treatment plant monitoring data from 1985 to the present shows little significant, consistent patterns of change in toxic pollutant concentrations. For further information, including results of toxic pollutant and pesticide testing, refer to the October 15, 1992 Industrial Waste Pretreatment Program annual report and the December 1991 Monitoring Program annual report.

Anchorage remains committed to an effective non-industrial source control program.

Sincerely,

  
Charley Bryant, Manager, Operations Division  
Anchorage Water and Wastewater Utility

cc: Greg Kellogg, EPA, Compliance Section (WD-135)  
Bob Robichaud, EPA, Regional Pretreatment Coordinator (WD-134)  
Dan Robison, EPA Alaska Operations Office  
Robert Dolan, ADEC, Anchorage  
Mark Premo, P.E., General Manager, AWWU  
Robert LeVar, Water Superintendent, AWWU  
Kris Warren, Wastewater Superintendent, AWWU  
Mark Spano, Lab Supervisor, Laboratory Services, AWWU